

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ESTES CARTER THOMPSON III,

Defendant

) Criminal No. 24cr10107  
)  
) Violations:  
)  
) Count One: Sexual Exploitation of Children and  
) Attempt  
) (18 U.S.C. §§ 2251(a) and (e))  
)  
) Count Two: Possession of Child Pornography  
) and Attempt  
) (18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))  
)  
) Forfeiture Allegation:  
) (18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Sexual Exploitation of Children and Attempt  
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

On or about September 2, 2023, in the District of Massachusetts, and elsewhere, the defendant,

ESTES CARTER THOMPSON III,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor A” (YOB 2009), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and



affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).



COUNT TWO

Possession of Child Pornography and Attempt  
(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))

The Grand Jury further charges:

On or about September 2, 2023, in the District of Massachusetts, and elsewhere, the defendant,

ESTES CARTER THOMPSON III,

knowingly possessed, and attempted to possess, material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).



CHILD PORNOGRAPHY/CHILD EXPLOITATION FORFEITURE ALLEGATION  
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 2251 and 2252A, set forth in Counts One and Two, the defendant,

ESTES CARTER THOMPSON III,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. The iCloud account associated with Apple ID [REDACTED];
- b. An Apple iPhone 12 Pro, serial number F17G9C6M0D83, IMEI 356037849301884;
- c. The dark blue Motorola smartphone seized from THOMPSON on January 18, 2024; and
- d. The Apple laptop, model A2681, Serial NHN6DW1KXV, seized from THOMPSON's vehicle on February 12, 2024.



2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

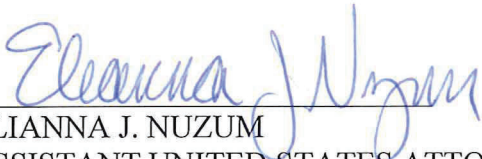
it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.



A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
ELIANNA J. NUZUM  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: APRIL 25 2024  
Returned into the District Court by the Grand Jurors and filed.

\_\_\_\_\_  
DEPUTY CLERK